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February 21, 2013

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Reports Analysis Division

Re: July Quarterly Report (04/01/2012 - 06/30/2012)

This letter responds to your request for additional information dated January 17, 2013, regarding independent expenditures reported on Emergency Committee for Israel's ('ECI') 2012 July Quarterly Report.

1) At the time of the creation of the independent expenditure ad referenced in your letter, it was ECI's understanding that the ad first aired on TV on June 25, 2012. ECI noted this date in the 'Purpose of Expenditure' section of Schedule 5-E of ECI's July Quarterly Report. ECI did not file a 24-hour report at the time because June 25 is outside of the 24 and 48-hour reporting windows for the June 26, 2012 New York Congressional Primary. See 11 C.F.R. 109.10(d).

In preparing for this response to the FEC's letter, however, ECI contacted the media buyer for the ad and discovered that the ad had limited airings on TV on June 23 and June 24. ECI recognizes that this earlier dissemination triggered a 24-hour IE report filing requirement, and if not for this inadvertent error, ECI would have timely filed the 24-hour IE report on June 24.

2) Your letter also requests information related to Schedule 5-A of the 2012 July Quarterly Report. Nothing was itemized on Schedule 5-A of this report because the independent expenditures disclosed on the report were paid for using ECI's general corporate funds. There were no contributions made for the purpose of furthering the reported expenditures. 11 C.F.R. 109.10(e)(vi).

Respectfully submitted,

Noah Pollak
Emergency Committee for Israel
